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August 22, 2008

**VIA HAND DELIVERY AND ELECTRONIC FILING**

The Honorable Joseph J. Farnan, Jr.  
United States District Court  
844 King Street  
Wilmington, DE 19801

Re: St. Clair Intellectual Property Consultants, Inc. v.  
General Imaging Co., et al, C.A. No. 08-371-JJF

Dear Judge Farnan:

Plaintiff St. Clair respectfully submits this letter in response to Defendants Research in Motion Ltd.'s and Research in Motion Corp.'s (collectively, "RIM") August 20, 2008 letter (D.I. 12) that was submitted in support of General Imaging Co.'s letter request to postpone the September 11, 2008 scheduling conference (D.I. 8).

As the Court is aware, St. Clair does not agree that the scheduling conference should be postponed. The extension of time given as a courtesy to RIM to answer St. Clair's complaint does not impede RIM's ability to discuss pretrial topics with the Court. Indeed, St. Clair and RIM have already started the process of preparing as outlined in the Court's Order and attached form. RIM participated in a Rule 26(f) meet and confer earlier this week and gave its proposals for the pretrial schedule to St. Clair yesterday. St. Clair will continue to work with RIM to prepare for the conference as required by this Court's Order and the Federal Rules of Civil Procedure.

RIM and St. Clair both have concrete proposals for each of the items set out in the Court's form order. There is no reason to delay discussion of these proposals with the Court beyond September 11<sup>th</sup>.<sup>1</sup>

Respectfully submitted,

/s/ Chad M. Shandler (#3796)

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<sup>1</sup> Notably, this Court has also set a September 11, 2008 date for the scheduling conference in a related case entitled *St. Clair Intellectual Property Consultants, Inc. v. FujiFilm Holding Corp. et. al*, C.A. No. 08-373 JJF (D. Del.). St. Clair and Fuji have engaged in the Rule 26(f) meet and confer and are in the process of preparing their Rule 26(f) report. St. Clair and Fuji will be fully prepared to discuss their pretrial proposals at the September 11<sup>th</sup> conference.

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cc: Clerk of the Court (via e-file)  
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